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April 14, 2023

By ECF

Honorable Paul A. Engelmayer
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: Saleem Ahmad, et al. v. New York City Health & Hospitals Corp. et al.
20-cv-00675 (PAE)
Our No. 2020-007695

Dear Judge Engelmayer:

I am an Assistant Corporation Counsel in the Office of Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, attorney for New York City Health & Hospitals Corporation ("H+H"), Ebone Carrington, and Hinnah Farooqi (together, "defendants") in the above-referenced action. I write on behalf of all parties to respectfully request an adjournment of the pre-motion conference, currently scheduled for April 18, 2023, until after the conclusion of their settlement discussions before Magistrate Judge Willis.

This extension is requested to permit the parties to continue to attempt to resolve this action without further significant intervention by this Court. On March 6, 2023, defendants reached an agreement in principle with one of the plaintiffs, Syed Kazmi. On April 12, 2023, defendants and plaintiff defendants engaged in settlement discussions with another plaintiff, Saleem Ahmad. While the parties did not reach an agreement yesterday, the parties have continued to engage in fruitful settlement discussions and plan to continue to do so. Additionally, the parties have scheduled a settlement conference with Magistrate Judge Willis for May 25, 2023, regarding a third plaintiff, Naseer Ahmed. The parties intend to schedule additional conferences with regard to the remaining plaintiffs thereafter. This additional time will afford the parties the necessary time to continue to engage in meaningful settlement negotiations.

Accordingly, the parties respectfully request that the Court adjourn the pre-motion conference until after the conclusion of settlement negotiations before Magistrate Judge Willis.

The parties will update the Court in 30 days regarding the status of their settlement negotiations. Thank you for your consideration of this request.

Respectfully Submitted,

s/ Lauren F. Silver

Lauren F. Silver
Assistant Corporation Counsel

cc: Counsel of Record (By ECF)

Granted. The pre-motion conference is adjourned *sine die*, and the parties shall file an update as to the status of settlement negotiations on May 12, 2023, and every four weeks thereafter. SO ORDERED.

Paul A. Engelmayer

PAUL A. ENGELMAYER
United States District Judge
April 14, 2023